

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

<b>CIRIACO PUCILLO,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 03-CV-12359 MLW</b>
	)	
<b>METSO PAPER, INC. AND</b>	)	
<b>VALMET CONVERTING, INC.</b>	)	
<b>Defendants.</b>	)	
	)	

**MOTION FOR SUMMARY JUDGMENT**

Defendant Valmet Converting, Inc. ("Valmet Converting"), by counsel, pursuant to Fed. R. Civ. P. 56 and Local Rule 56.1, respectfully moves the Court for entry of summary judgment.

In support of the motion, Valmet Converting incorporates by reference as if fully set forth herein, and respectfully invites the Court's attention to, the accompanying Local Rule 56.1 Statement of Material Facts to Which There is no Genuine Issue and to defendant's Memorandum of Points and Authorities in Support of Motion for Summary Judgment filed herewith.

Date: June 30, 2006

Respectfully submitted,

/s/ David L. Kelleher  
David L. Kelleher, Esq. (B.B.O. #543912)  
Thelen Reid & Priest, LLP  
701 Eighth Street, N.W., Suite 800  
Washington, DC 20004  
(202) 508-4000

and

Mark Petersen, Esq. (B.B.O. #396840)  
Michelle Hansen, Esq. (B.B.O. #561477)  
Law Offices of Mark Petersen  
490 Shrewsbury Street  
Worcester, MA 01604  
(508) 791-0300

Attorneys for Defendant Valmet Converting, Inc.